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LETTER AND COMMENTS FROM FLORIDA DEPARTMENT OF ENVIRONMENTAL
REGULATION REGARDING EXPANDED SITE INVESTIGATION REPORT NS MAYPORT FL
11/16/1988
FLORIDA DEPARTMENT OF ENVIRONMENTAL REGULATION

32228-000
01.01.00.0011

Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 16, 1988

Mr. Jim Reed
Department Of The Navy
Southern Division
Naval Facilities Engineering Command
P.O. Box 10068
Charleston, S.C. 29411-0068

Dear Mr. Reed:

The enclosed memoranda document the Department's comments for the Mayport Naval Station, NIRP Expanded Site Investigation, April 1988. The memorandum from Jim Crane states general concerns, while the one from Stephen Knuttle provides specific comments on the sites.

If I can be of any further assistance, please contact me at 904/488-0190.

Sincerely,

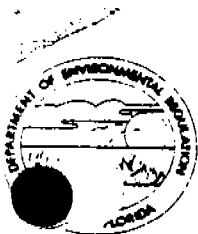
Eric S. Nuzie

Eric S. Nuzie
Environmental Supervisor II
Bureau of Waste Cleanup

ESN/mlr

Enclosure

cc: Stephen Knuttle
Satish Kastury
Jose Negron
Mickey Hartnett
Wayne Mathis



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

For Routing To Other Than The Addressee	
To: _____	Location: _____
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Interoffice Memorandum

TO: Eric Nuzie, Bureau of Waste Cleanup

FROM: Jim Crane, Bureau of Waste Cleanup *JJC*

DATE: September 20, 1988

SUBJECT: Naval Station, Mayport, Final Report, NIRP Expanded Site Investigation, April 1988

I've reviewed the subject document and offer these comments for your consideration. This Expanded Site Investigation (ESI) is equivalent to the Confirmation Study-Verification Step of the old NACIP terminology. The ESI was conducted on ten sites: 1,2,4,5,6,7,8,9,13,14 and 16. The investigation seems to be satisfactory for its purpose. I do, however, have several comments which need to be addressed.

Many of the recommendations for additional work involve use of an environmental risk assessment. It may be that the environmental risk assessment is broad enough in scope to address some of my concerns. I cannot tell from this report.

My main concern is with the recurring statement that no criteria exist for the compounds in soils. If this means no fixed numerical standards, this is a valid statement. The Department, though, does have criteria for soils. Since FDER is charged by Florida Statutes with the protection of the public health, welfare and the environment, FDER has the authority to require assessment and remediation of soils which contain contaminants in concentrations which are hazardous to the public health, welfare and the environment. This policy translates into addressing the soil contamination concentrations in the following terms: 1) whether the soil is a source of groundwater contamination; 2) whether the soils present a hazard to human health or welfare through soil contact, soil and fume inhalation or ingestion; and 3) whether the soils present hazards to the environment such as acute or chronic toxicity to wildlife.

These issues should be addressed in the environmental risk assessment (ERA). Exposure routes that exist or potentially could exist by which soil contamination would pose a hazard or a source of groundwater contamination should be discussed in the ERA.

Eric Nuzie
September 20, 1988
Page Two

At Site 8, free product was found, but only a risk assessment was proposed. I think the extent of the free product should be determined and some attempt at recovery should be considered.

If the soil criteria issue is addressed adequately in the endangerment risk assessment, I think most of the recommendations, with the exception of Site 8, are reasonable. This opinion, of course, is based on the assumption that the well and sampling locations were adequately placed to find the worst case contamination at each site. A risk assessment is unacceptable if the plume or contaminated area is not defined. It appears to me from what I can tell from the report maps that the wells and sampling points were placed with this concept in mind.

JJC/tlk



Statement of Basis

This statement of basis is prepared pursuant to 40 CFR Section 124.7 for the EPA draft permit for U.S. Navy, Mayport Naval Station located in Mayport, Florida. The permit will set conditions for the identification and investigation of solid waste management units. Conditions will also be set to verify prior/continuing releases of hazardous waste or constituents from the solid waste management units. If releases are found, then the permit may be modified for corrective action. The permit will also set conditions for certification of waste minimization.

This permit is being issued based on the requirements of the Hazardous and Solid Waste Amendments of 1984, Public law 98-616. These amendments to the Resource Conservation and Recovery Act (RCRA) have a number of provisions affecting hazardous waste permitting that must be addressed in any RCRA hazardous waste permit issued after November 8, 1984.

The State of Florida has been granted authorization for those portions of the RCRA Hazardous Waste Program that were in effect prior to the passage of the Hazardous and Solid Waste Amendments of 1984. Until Florida has made the necessary provisions of the 1984 amendments, EPA will administer the requirements of the 1984 amendments.

The existing RCRA hazardous waste storage permit issued by EPA on July 26, 1983, will terminate upon issuance of this permit and the hazardous waste storage permit being issued by the State of Florida. Termination of the RCRA permit is in accordance with 40 CFR §271.18(b)(6) where EPA, the State and Permittee are in agreement. The new federal permit and the State permit together will constitute the full RCRA permit for this facility.

INTEROFFICE MEMORANDUM

And To Other Than The addressee	
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To: _____	Loctn.: _____
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From: _____	Date: _____
Reply Optional ()	Reply Required () Info. Only ()
Date Due: _____	Date Due: _____

NORTHEAST DISTRICT - JACKSONVILLE

TO: Eric Nutie
Bureau of Waste Clean-up, Tallahassee

THROUGH: Jay Carver *JC*
Technical Services, Jacksonville

FROM: Stephen Knüttel *SK*
Technical Services, Jacksonville

DATE: November 2, 1988

SUBJECT: U.S. Naval Air Station Mayport: Naval Installation
Restoration Program (NIRP) Expanded Site
Investigation Final Report, submitted August 12,
1988.

I have reviewed the subject document and have comments for your consideration. At most sites, contamination has been indicated but only a risk assessment has been proposed. I think that it is somewhat premature to propose a risk assessment at these sites. Further delineation of the contamination, a feasibility study and remedial actions appear to be more appropriate at this time. My specific comments are as follows:

Site 1

Lead is reported above the drinking water standard and above the USEPA ambient water quality criteria for chronic exposure in marine environments in well MPT-1-B. It is not clear how an environmental risk assessment could be acceptable when lead levels are above standards that are based on risk levels. Some remedial action is required.

Site 2

The proposed work appears adequate.

Site 4

It is stated in the conclusions that groundwater flow at Site 4 is anticipated to be radial. Therefore, additional monitoring wells should be installed at the northwest and southeast corners of the site to verify the direction of groundwater flow and to detect possible releases. Lead is also reported above the drinking water standard in well MPT-2-B.

Site 5

Remedial action is required due to the elevated chromium concentrations at Site 5. Additional monitoring of the existing wells should be conducted to confirm contamination.

Site 6

Site 6 is the largest of the landfills at N.A.S. Maxport (24 acres) and has only 3 monitoring wells to monitor releases. Two of these wells are located in the same area as a cluster well on the north corner of the landfill and the other is approximately 400 ft. east of the landfill. This system appears inadequate to monitor all possible releases from the landfill. Additionally the highest area of the Naval Station is located to the northeast of the site and a swampy area is located to the south. Therefore, it seems likely that some component of groundwater flow should be moving to the south. A minimum of 4-5 additional monitoring wells should be installed around the perimeter of the landfill and samples analyzed.

Site 8

At a minimum, the free product observed in monitoring well MPT-8-3 must be removed. Additional monitoring of the existing well should be conducted. The lab data sheets for well MPT-8-3 should be checked, endrine aldehyde is recorded below detection limits and heptachlor is recorded as .03 ug/l.

Site 9

The lab data sheets for well MPT-9-1 should be checked. B-BHC not alarm is recorded at .07 ug/l. The recommendations for Site 9 state that an environmental risk assessment will be done on the site because of elevated levels of total mercury. What about the level of 0,4 -DDE which exceeds the USEPA ambient water quality criteria for chronic exposure in marine environments and the level of naphthalene which exceeds the FDER target level for groundwater cleanup, will they be addressed? How will the level of B-BHC relate to the risk assessment?

Site 10

The proposed work appears adequate. The additional wells should be placed as close to the fire training areas as physically possible.

Site 14

Only two soil samples were taken from the monitoring well borings. Additional soil samples should be taken and analyzed from the area of the spill, the oil-water separator and near the concrete pad. The exact locations of the concrete pad, oil-water separator and drum storage area should be clearly indicated on Figure 3-14. The site description indicated that the oil-water separator malfunctioned and contaminated the soil behind Building 1456. Which direction is "behind" Building 1456? This area should be sampled.

Site 16

The proposed work appears adequate.

Please call me if you have any further questions.

SK:bt

cc: Ashwin Patel